

United States Magistrate Court  
GRG - SDTX  
FILED

AO 91 (Rev. 02/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

JUN - 8 2015 AV

for the  
Southern District of TexasDavid J. Bradley, Clerk  
Laredo Division

United States of America

v.

Charles Francis Hurt  
Laredo, Texas*Defendant*FPD )  
)  
DET/PE )  
6/11/15 )

Case No. 515MJ781

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 05/05/2015 in the county of WEBB in the SOUTHERN District of  
TEXAS, the defendant violated Title 18 U. S. C. § 2422 (b) and 2423 (b)  
, an offense described as follows:

using a facility and means of interstate commerce, did knowingly persuade, induce, entice and coerce an individual who had not attained the age of eighteen years, to engage in sexual activity under such circumstances as would constitute a criminal offense, and attempted to do so.

A person who travels in interstate commerce or travels in the United States, or a United States citizen or an alien admitted for permanent residence in the United States who travels in foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

☒ Continued on the attached sheet.  
Complainant's signature

Jeffrey Williams, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/08/2015  
Judge's signatureCity and state: Laredo, Texas

Guillermo R. Garcia, U.S. Magistrate

Printed name and title

## ATTACHMENT A

I, Jeffrey S. Williams, a Special Agent of United States Immigration and Customs Enforcement, Homeland Security Investigations, have knowledge of the following facts:

1. On May 5, 2015, Homeland Security Investigations (HSI) Laredo special agents initiated an online investigation on a subject later identified as Charles Francis HURT.
2. From May 5, 2015, to June 5, 2015, HURT communicated through cell phone texts, emails and video chat detailing his intended plans to engage in sexual acts with a fourteen (14) year old girl. These communications were with HSI Laredo special agents, who were acting in an undercover capacity (UC), as a fourteen year-old girl and the child's mother. During these communications, HURT agreed to meet with the UC for the purpose of engaging in a sexual act with the 14 year old girl.
3. In the state of Texas, the type of sexual conduct described by HURT, if it was to occur with the individual he thought to be a fourteen (14) year old, would be considered sexual assault, statutory rape, a violation of Texas Penal Code.
4. On June 5, 2015, HURT traveled via commercial airplane from Memphis International Airport through Charlotte Douglass International Airport, Dallas Fort Worth International airport to Laredo International Airport for the purpose of engaging in a sexual act with a fourteen year old female. HURT was arrested by HSI agents with the assistance of the Laredo International Airport Police Department, Webb County Sheriff's Office and the Laredo Police Department.
5. HURT was advised of his Miranda Rights in the English language and agreed to speak with agents. HURT acknowledged that he sent sexually explicit communications to the UC mother and UC child via email, text message and video chat. HURT stated that all the sexually explicit communications made to the 14 year old girl were made under his freedom of speech right. HURT was in possession of Bondage Discipline Sadomasochism (BDSM) equipment, sex toys, and pornography.